

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

This document relates to:

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P. et al.*,
Case No. 18-OP-45090

**DECLARATION OF TIMOTHY W. KNAPP IN SUPPORT OF MANUFACTURER
DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY ADJUDICATION THAT DEFENDANTS DID NOT COMPLY WITH
THEIR DUTIES UNDER THE FEDERAL CONTROLLED SUBSTANCES ACT TO
REPORT SUSPICIOUS OPIOID ORDERS AND NOT SHIP THEM**

I, Timothy W. Knapp, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Defendants Allergan Finance, LLC, Allergan plc, Allergan Sales, LLC, and Allergan USA, Inc. in the above captioned case.
2. I submit this declaration in support of Manufacturer Defendants' Opposition To Plaintiffs' Motion For Partial Summary Adjudication That Defendants Did Not Comply With Their Duties Under The Federal Controlled Substances Act To Report Suspicious Opioid Orders And Not Ship Them.
3. Attached as Exhibit 50 is a true and correct copy of ALLERGAN_MDL_01451450.
4. Attached as Exhibit 51 is a true and correct copy of ALLERGAN_MDL_01979834.
5. Attached as Exhibit 52 is a true and correct copy of Acquired_Actavis_01931815.
6. Attached as Exhibit 53 is a true and correct copy of Acquired_Actavis_00780400.
7. Attached as Exhibit 54 is a true and correct copy of Acquired_Actavis_00488498.

8. Attached as Exhibit 55 is a true and correct copy of ALLERGAN_MDL_03535130.
9. Attached as Exhibit 56 is a true and correct copy of excerpts from the 1/9/19 Deposition of Mary Woods.
10. Attached as Exhibit 57 is a true and correct copy of ALLERGAN_MDL_03738529.
11. Attached as Exhibit 58 is a true and correct copy of Acquired_Actavis_01675888.
12. Attached as Exhibit 59 is a true and correct copy of ALLERGAN_MDL_04164213.
13. Attached as Exhibit 60 is a true and correct copy of ALLERGAN_MDL_04164345.
14. Attached as Exhibit 61 is a true and correct copy of ALLERGAN_MDL_02187198.
15. Attached as Exhibit 62 is a true and correct copy of ALLERGAN_MDL_02467197.
16. Attached as Exhibit 63 is a true and correct copy of ALLERGAN_MDL_02081605.

Respectfully submitted,

Dated: July 31, 2018

/s/ Timothy W. Knapp

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Allergan Finance, LLC f/k/a/ Actavis, Inc. f/k/a Watson
Pharmaceuticals, Inc.; Allergan Sales, LLC; Allergan
USA, Inc.*

